## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	Chapter 11
	§	
MMA LAW FIRM, PLLC,	§	
	§	Case No. 24-31596
Debtor.	§	

EAJF'S JOINDER TO DEBTOR'S OBJECTION TO THE SECOND INTERIM FEE APPLICATION OF OTTERBOURG P.C. AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE FEE PERIOD FROM NOVEMBER 1, 2024 THROUGH APRIL 30, 2025

## TO THE HONORABLE EDUARDO V. RODRIGUEZ, CHIEF UNITED STATES BANKRUPTCY JUDGE:

Secured Prepetition Lenders Equal Access Justice Fund, LP and EAJF ESQ Fund, LP (collectively, "EAJF"), by and through their attorneys, hereby file this Joinder to the Debtor's Objection (the "Objection") to the Second Interim Fee Application of Otterbourg P.C. as Co-Counsel to the Official Committee of Unsecured Creditors for the Fee Period From November 1, 2024 Through April 30, 2025 [ECF # 707], and respectfully show as follows.

1. As set forth in the Debtor's Objection, certain components of the Otterbourg Application [ECF # 695] deserve particularly close scrutiny. More specifically, certain requests in the Otterbourg Application seek: (1) compensation for services where an inordinate amount of time was spent, resulting in possible overbilling; (2) compensation for unnecessary services, including services duplicative of those provided by co-counsel Lawson & Moshenberg PLLC; (3) compensation for services that do not comply with the U.S. Trustee's Guidelines; and (4) compensation for services that did not provide a material benefit to the estate. EAJF shares similar concerns regarding the Otterbourg Application and hereby joins in the Debtor's Objection to same.

WHEREFORE, EAJF respectfully requests that the Court (1) sustain the Objection to the Otterbourg Application; (2) award Otterbourg only those fees and expenses as permitted by law after deducting all non-compensable amounts sought; and (3) grant such other and further relief as is equitable and just.

Dated: July 8, 2025.

Respectfully submitted,

SPENCER FANE, LLP

By: /s/ Misty A. Segura
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COUNSEL FOR EQUAL ACCESS JUSTICE FUND, LP AND EAJF ESO FUND, LP

## **CERTIFICATE OF SERVICE**

I certify that on July 8, 2025, a true and correct copy of the foregoing document was served by electronic service via the Court's ECF filing system on those parties registered to receive service via the Clerk of the Court through the ECF system.

/s/ Misty A. Segura MISTY A. SEGURA